

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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Name of Court: United States District Court
District Of New Jersey

2014 MAR 13 AM 9

Title Of Action: Civil Action

Lateefah C. Brown

Civil Action No.

(Plaintiff)

Vs

The Division Of Youth and family Services (DYFS)

COMPLAINT

(Defendants)

And

The Honorable Darrell M. Fineman, J.S.C

(Defendants)

PARTIES

Lateefah C. Brown

421 N. Hobart st., Philadelphia, PA, 19131

(Plaintiff)

The Division Of Youth and Family Services (DYFS)

199 East Broadway, 2nd Floor

Salem, New Jersey, 08079

(Defendants)

And

The Honorable Darrell M. Fineman, J.S.C,

Salem- Family Division

92 Market St

Salem, NJ, 08079

(Defendants)

JURISDICTION

Lateefah Brown a former resident of PennsGrove New Jersey. The Salem County (DYFS) office became involved in my family's life and removed my child from my care. While a resident of New Jersey. I presently reside in Philadelphia, PA.

CAUSE OF ACTION

My civil rights and my child's civil rights were violated in many ways by Salem County (DYFS). Point One the trial court committed error by finding Lateefah Brown abused or neglected my child and the lower court's decision should be reversed. Point Two the case should have been dismissed and my child should have been returned to my care the mother because the DYFS failed to prove by a preponderance of the evidence that my child was abused or neglected by Lateefah Brown. Point Three the court committed error by awarding physical and legal custody to the father Lamarr Johnson.

- a. Plaintiff's due process rights were violated by the court preceeding to a G.M. hearing without relieving the dyfs from its obligation to provide reasonable efforts to re- unify the family and by not conducting a permanency hearing.
- b. Neither the DYFS nor the father established it was in the best interest of my child to award custody to the father.

DEMAND

1. Reverse the decision of placing Lateefah Brown on New Jersey Central Registry.
2. Reverse the decision of placing my child with his father
3. Monetary Compensation